

EMERY CELLI BRINCKERHOFF & ABADY LLP

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
EARL S. WARD
ILANN M. MAAZEL
HAL R. LIEBERMAN
DANIEL J. KORNSTEIN
O. ANDREW F. WILSON
ELIZABETH S. SAYLOR
KATHERINE ROSENFELD
DEBRA L. GREENBERGER
ZOE SALZMAN
SAM SHAPIRO

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbalaw.com

DIANE L. HOUK
EMMA L. FREEMAN
DAVID BERMAN
HARVEY PRAGER
SCOUT KATOVICH
NICK BOURLAND
ANDREW K. JONDAHL
ANANDA BURRA
MAX SELVER

April 20, 2020

Via ECF

The Honorable Debra Freeman
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Karol v. City of New York, et al., No. 18 Civ. 6467

Your Honor:

We write, on behalf of Plaintiff Stanley Karol, together with counsel for non-party New York Hotel & Motel Trades Council (“HTC”), pursuant to the Court’s April 15, 2020 order granting additional time to submit a status letter regarding our efforts to resolve any disputes related to Plaintiff’s subpoena. Plaintiff and HTC agree that HTC will aim to produce documents responsive to the agreed-upon revised subpoena requests by May 29, 2020. HTC reserves its right to request additional time if the current public health crisis renders it unfeasible to search for and/or produce documents on that timeline.

Respectfully submitted,

/s/

Debra Greenberger
Andrew K. Jondahl

c. All Counsel of Record (*via* ECF)

Barry N. Saltzman (*via* ECF and E-mail)
bsaltzman@pittalaw.com
Counsel for HTC